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## UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS (WESTERN DIVISION)

In re:	
4RUN3 RACING LLC,	Chapter 7 Case No. 24-30244-EDK
Debtor.	

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned appears as counsel for **Joseph H. Baldiga, Chapter 7 Trustee of the Bankruptcy Estate of 4Run3 Racing LLC, Case No. 24-30244-EDK** (the "Trustee") and, pursuant to Bankruptcy Rules 9010, 3017 and 2002, Bankruptcy Code Section 1109(b) and MLBR 9010-3, requests that all notices given or required to be given in this proceeding and all papers served in this proceeding be given to and served upon the undersigned at the office and address set forth below.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, orders and notices of any application, motions, petitions, pleadings, requests, disclosure statements and motions to approve same, complaints or demands, whether formal or informal, written or oral, and whether served by mail, telephone, telecopier or otherwise: (1) which may directly, or indirectly, affect or seek to affect any rights or interests of the Trustee with respect to (a) the Debtor, (b) property or proceeds thereof in which the Debtor may claim an interest, or (c) property or proceeds thereof in possession, custody or control of the Trustee, which the Debtor may seek to use; or (2) which require or seek to require any act, delivery of any property, payment or other conduct by the Trustee; or (3) which may otherwise affect the Debtor or the property of the Debtor.

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This filing does not constitute consent to jurisdiction or venue in the United States Bankruptcy Court for the District of Massachusetts and does not constitute a waiver of any rights including the right to trial by jury.

Respectfully submitted,

JOSEPH H. BALDIGA, CHAPTER 7 TRUSTEE OF THE BANKRUPTCY ESTATE OF 4RUN3 RACING LLC

By his counsel,

/s/ Shannah L. Colbert

Shannah L. Colbert, BBO #712955

Mirick, O'Connell, DeMallie & Lougee, LLP

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Dated: August 2, 2024 Email: scolbert@mirickoconnell.com

## **CERTIFICATE OF SERVICE**

I hereby certify that, on August 2, 2024, the foregoing document was filed with the United States Bankruptcy Court – District of Massachusetts and served upon all parties entitled to receive notice of filings in the above-captioned case via the Bankruptcy Court's Electronic Case Filing (ECF) system.

By: /s/ Shannah L. Colbert
Shannah L. Colbert, Esq.